**MEMO ENDORSED**

MICHAEL A. CARDOZO
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

SUMIT SUD
Assistant Corporation Counsel
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(212) 788-1096
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December 7, 2007

BY FAX (212) 805-6724

The Honorable Frank Maas
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York

*The Law Department's
time to respond is extended
to ten days after Mr. Goodson
provides the further information.*

Re: Jeffery Goodson v. Commissioner et al.
07 CV 05961 (PKC)(FM)

*FM, SUMIT,
12/7/07*

Your Honor:

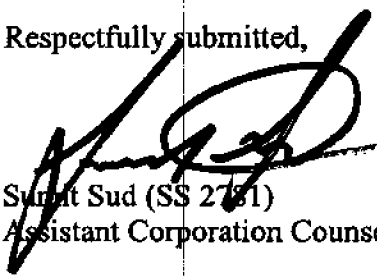
I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and the attorney assigned to this matter. I write in furtherance of Your Honor's Valentin Order, dated November 29, 2007, wherein you direct this office to provide plaintiff with the name and service address of defendant "Captain Cruz" within ten days. For the reasons set forth below, I respectfully request an enlargement of time to respond. Plaintiff is currently incarcerated and as such, unable to consent to this request.

As soon as this office became aware of Your Honors' order, it began an investigation to identify the possible identities of a "Captain Cruz" employed at Anne M. Kross Center at Riker's Island. The undersigned was informed on November 30, 2007, by representatives of the Department of Corrections that there are multiple individuals who fit that description. As such, the undersigned immediately sent plaintiff a letter, a copy of which is annexed hereto, to request that he provide additional identifying information with regards to the "Captain Cruz" he is referring to in his complaint, such as gender, race, and approximate dates that he had interaction with this individual. To date this office has not received a response to our request from plaintiff.

Accordingly, as soon as this office received this additional identifying information, it will identify "Captain Cruz" and provide that information to plaintiff and the Court, in compliance with Your Honors' Order.

Thank you for your consideration of this request.

Respectfully submitted,



Sumit Sud (SS 2781)
Assistant Corporation Counsel

Encl.

cc: Jeffery Goodson
DIN 07 A 1685
Franklin Correctional Facility
P.O. Box. 10
Malone, N.Y.
12953 (By First Class Mail)



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LAW DEPARTMENT
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November 30, 2007

BY FIRST CLASS MAIL

Mr. Jeffery Goodson
DIN 07 A 1685
Franklin Correctional Facility
P.O. Box. 10
Malone, N.Y.
12953

Re: Jeffery Goodson v. Commissioner et al.,
07 CV 05961 (PKC)(FM)

Dear Mr. Goodson:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and the attorney assigned to this matter. I write in regards to the Valentin order that was endorsed by the Hon. Frank Mass on November 30, 2007, instructing this office to help you in identifying "Security Captain Cruz. AMKC."

In order for this office to do so, you need to provide more identifying information with regards to Captain Cruz. For example, please inform the undersigned as to the gender, race and the approximate dates that you spoke to this individual and any other information you believe will assist in identifying this individual. Without this additional information, this office will not be able to identify Captain Cruz, as there are multiple individuals with that name at D.O.C. In addition, this office encourages plaintiff to contemplate and convey a reasonable settlement demand in order to resolve this matter at an early stage.

Accordingly, please provide the requested information as soon as possible, so that this office can timely respond to the Hon. Frank Maas' Order.

Yours truly,



Sumit Sud
Assistant Corporation Counsel